

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

-----X
BRUCE RIGGS, Individually, and on Behalf of
All Others Similarly Situated,

Plaintiff,

vs.

MASSACHUSETTS FINANCIAL SERVICES
COMPANY, MFS INVESTMENT
MANAGEMENT, SUN LIFE FINANCIAL, INC.,
MFS SERIES TRUST I, MFS SERIES TRUST II,
MFS SERIES TRUST III, MFS SERIES TRUST IV,
MFS SERIES TRUST V, MFS SERIES TRUST VI,
MFS SERIES TRUST VII, MFS SERIES TRUST
VIII, MFS SERIES TRUST IX, MFS SERIES
TRUST X, MFS SERIES TRUST XI, MFS
CAPITAL OPPORTUNITIES FUND, MFS CORE
GROWTH FUND, MFS LARGE CAP GROWTH
FUND, MFS MANAGED SECTORS FUND, MFS
MID CAP GROWTH FUND, MFS NEW
DISCOVERY FUND, MFS NEW ENDEAVOR
FUND, MFS RESEARCH FUND, MFS
STRATEGIC GROWTH FUND, MFS
TECHNOLOGY FUND, MASSACHUSETTS
INVESTORS GROWTH STOCK, MFS MID CAP
VALUE FUND, MFS RESEARCH GROWTH
AND INCOME FUND, MFS TOTAL RETURN
FUND, MFS UNION STANDARD EQUITY FUND,
MFS UTILITIES FUND, MFS VALUE FUND,

Civ. No. 03 CV 12500 (WGY)

[Caption continued on next page]

**MOTION OF THE BURRELL PROPOSED LEAD PLAINTIFFS FOR
CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFFS
AND APPROVAL OF SELECTION OF LEAD AND LIAISON COUNSEL**

MASSACHUSETTS INVESTORS TRUST, MFS :
 AGGRESSIVE GROWTH ALLOCATION FUND, :
 MFS CONSERVATIVE ALLOCATION FUND, :
 MFS MODERATE ALLOCATION FUND, MFS :
 BOND FUND, MFS EMERGING MARKETS :
 DEBT FUND, MFS GOVERNMENTAL :
 LIMITED MATURITY FUND, MFS :
 GOVERNMENT MORTGAGE FUND, MFS :
 GOVERNMENT SECURITIES FUND, MFS :
 HIGH INCOME FUND, MFS HIGH YIELD :
 OPPORTUNITIES FUND, BOND FUND, MFS :
 LIMITED MATURITY FUND, MFS RESEARCH :
 BOND FUND, MFS STRATEGIC INCOME FUND, :
 MFS ALABAMA MUNICIPAL BOND FUND, :
 MFS ARKANSAS MUNICIPAL BOND FUND, :
 MFS CALIFORNIA MUNICIPAL BOND FUND, :
 MFS FLORIDA MUNICIPAL BOND FUND, MFS :
 GEORGIA MUNICIPAL BOND FUND, MFS :
 MARYLAND MUNICIPAL BOND FUND, MFS :
 MASSACHUSETTS MUNICIPAL BOND FUND, :
 MFS MISSISSIPPI MUNICIPAL BOND FUND, :
 MFS MUNICIPAL BOND FUND, MFS :
 MUNICIPAL LIMITED MATURITY FUND, :
 MFS NEW YORK MUNICIPAL BOND FUND, :
 MFS NORTH CAROLINA MUNICIPAL BOND :
 FUND, MFS PENNSYLVANIA MUNICIPAL :
 BOND FUND, MFS SOUTH CAROLINA :
 MUNICIPAL BOND FUND, MFS TENNESSEE :
 MUNICIPAL BOND FUND, MFS VIRGINIA :
 MUNICIPAL BOND FUND, MFS WEST :
 VIRGINIA MUNICIPAL BOND FUND, MFS :
 EMERGING MARKETS EQUITY FUND, MFS :
 GLOBAL EQUITY FUND, MFS GLOBAL :
 GROWTH FUND, MFS GLOBAL TOTAL :
 RETURN FUND, MFS INTERNATIONAL :
 GROWTH FUND, MFS INTERNATIONAL :
 NEW DISCOVERY FUND, MFS :
 INTERNATIONAL VALUE FUND, MFS :
 RESEARCH INTERNATIONAL FUND, MFS :
 SERIES TRUST VII and ALL DEFENDANTS, :

Defendants. :

-----X
 [Additional Captions Set Forth Below]

-----X
OLIVER S. TRONE, Individually, and on Behalf of
All Others Similarly Situated,

Plaintiff,

Civ. No. 03 CV 12514 (WGY)

vs.

MFS CAPITAL OPPORTUNITIES FUND, MFS
CORE GROWTH FUND, MFS LARGE CAP
GROWTH FUND, MFS MANAGED SECTORS
FUND, MFS MID CAP GROWTH FUND, MFS
NEW DISCOVERY FUND, MFS NEW
ENDEAVOR FUND, MFS RESEARCH FUND,
MFS STRATEGIC GROWTH FUND, MFS
TECHNOLOGY FUND, MASSACHUSETTS
INVESTORS GROWTH STOCK, MFS MID CAP
VALUE FUND, MFS RESEARCH GROWTH
AND INCOME FUND, MFS TOTAL RETURN
FUND, MFS UNION STANDARD EQUITY FUND,
MFS UTILITIES FUND, MFS VALUE FUND,
MASSACHUSETTS INVESTORS TRUST, MFS
AGGRESSIVE GROWTH ALLOCATION FUND,
MFS CONSERVATIVE ALLOCATION FUND,
MFS MODERATE ALLOCATION FUND, MFS
BOND FUND, MFS EMERGING MARKETS
DEBT FUND, MFS GOVERNMENTAL
LIMITED MATURITY FUND, MFS
GOVERNMENT MORTGAGE FUND, MFS
GOVERNMENT SECURITIES FUND, MFS
HIGH INCOME FUND, MFS HIGH YIELD
OPPORTUNITIES FUND, BOND FUND, MFS
LIMITED MATURITY FUND, MFS RESEARCH
BOND FUND, MFS STRATEGIC INCOME FUND,
MFS ALABAMA MUNICIPAL BOND FUND,
MFS ARKANSAS MUNICIPAL BOND FUND,
MFS CALIFORNIA MUNICIPAL BOND FUND,
MFS FLORIDA MUNICIPAL BOND FUND, MFS
GEORGIA MUNICIPAL BOND FUND, MFS
MARYLAND MUNICIPAL BOND FUND, MFS
MASSACHUSETTS MUNICIPAL BOND FUND,
MFS MISSISSIPPI MUNICIPAL BOND FUND,

MFS MUNICIPAL BOND FUND, MFS
MUNICIPAL LIMITED MATURITY FUND,
MFS NEW YORK MUNICIPAL BOND FUND,
MFS NORTH CAROLINA MUNICIPAL BOND
FUND, MFS PENNSYLVANIA MUNICIPAL
BOND FUND, MFS SOUTH CAROLINA
MUNICIPAL BOND FUND, MFS TENNESSEE
MUNICIPAL BOND FUND, MFS VIRGINIA
MUNICIPAL BOND FUND, MFS WEST
VIRGINIA MUNICIPAL BOND FUND, MFS
EMERGING MARKETS EQUITY FUND, MFS
GLOBAL EQUITY FUND, MFS GLOBAL
GROWTH FUND, MFS GLOBAL TOTAL
RETURN FUND, MFS INTERNATIONAL
GROWTH FUND, MFS INTERNATIONAL
NEW DISCOVERY FUND, MFS
INTERNATIONAL VALUE FUND, MFS
RESEARCH INTERNATIONAL FUND, MFS
CASH RESERVE FUND, MFS GOVERNMENT
MONEY MARKET FUND, MFS MONEY
MARKET FUND, MFS MUNICIPAL SERIES
TRUST, MFS SERIES TRUST I, MFS SERIES
TRUST II, MFS SERIES TRUST III, MFS SERIES
TRUST IV, MFS SERIES TRUST V, MFS SERIES
TRUST VI, MFS SERIES TRUST VII, MFS SERIES:
TRUST VIII, MFS SERIES TRUST IX, MFS
SERIES TRUST X, MFS SERIES TRUST XI, SUN
LIFE FINANCIAL, INC., JOHN DOES 1-100, and
ALL DEFENDANTS,

Defendants.

-----X

-----X
DANIELLE ADAMS and
DEAN DELLAVENTURA, Individually, and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

MFS CAPITAL OPPORTUNITIES FUND, MFS
CORE GROWTH FUND, MFS LARGE CAP
GROWTH FUND, MFS MANAGED SECTORS
FUND, MFS MID CAP GROWTH FUND, MFS
NEW DISCOVERY FUND, MFS NEW
ENDEAVOR FUND, MFS RESEARCH FUND,
MFS STRATEGIC GROWTH FUND, MFS
TECHNOLOGY FUND, MASSACHUSETTS
INVESTORS GROWTH STOCK, MFS MID CAP
VALUE FUND, MFS RESEARCH GROWTH
AND INCOME FUND, MFS TOTAL RETURN
FUND, MFS UNION STANDARD EQUITY FUND,
MFS UTILITIES FUND, MFS VALUE FUND,
MASSACHUSETTS INVESTORS TRUST, MFS
AGGRESSIVE GROWTH ALLOCATION FUND,
MFS CONSERVATIVE ALLOCATION FUND,
MFS MODERATE ALLOCATION FUND, MFS
BOND FUND, MFS EMERGING MARKETS
DEBT FUND, MFS GOVERNMENTAL
LIMITED MATURITY FUND, MFS
GOVERNMENT MORTGAGE FUND, MFS
GOVERNMENT SECURITIES FUND, MFS
HIGH INCOME FUND, MFS HIGH YIELD
OPPORTUNITIES FUND, BOND FUND, MFS
LIMITED MATURITY FUND, MFS RESEARCH
BOND FUND, MFS STRATEGIC INCOME FUND,
MFS ALABAMA MUNICIPAL BOND FUND,
MFS ARKANSAS MUNICIPAL BOND FUND,
MFS CALIFORNIA MUNICIPAL BOND FUND,
MFS FLORIDA MUNICIPAL BOND FUND, MFS
GEORGIA MUNICIPAL BOND FUND, MFS
MARYLAND MUNICIPAL BOND FUND, MFS

Civ. No. 03 CV 12536 (WGY)

MASSACHUSETTS MUNICIPAL BOND FUND, :
MFS MISSISSIPPI MUNICIPAL BOND FUND, :
MFS MUNICIPAL BOND FUND, MFS :
MUNICIPAL LIMITED MATURITY FUND, :
MFS NEW YORK MUNICIPAL BOND FUND, :
MFS NORTH CAROLINA MUNICIPAL BOND :
FUND, MFS PENNSYLVANIA MUNICIPAL :
BOND FUND, MFS SOUTH CAROLINA :
MUNICIPAL BOND FUND, MFS TENNESSEE :
MUNICIPAL BOND FUND, MFS VIRGINIA :
MUNICIPAL BOND FUND, MFS WEST :
VIRGINIA MUNICIPAL BOND FUND, MFS :
EMERGING MARKETS EQUITY FUND, MFS :
GLOBAL EQUITY FUND, MFS GLOBAL :
GROWTH FUND, MFS GLOBAL TOTAL :
RETURN FUND, MFS INTERNATIONAL :
GROWTH FUND, MFS INTERNATIONAL :
NEW DISCOVERY FUND, MFS :
INTERNATIONAL VALUE FUND, MFS :
RESEARCH INTERNATIONAL FUND, MFS :
CASH RESERVE FUND, MFS GOVERNMENT :
MONEY MARKET FUND, MFS MONEY :
MARKET FUND, MFS MUNICIPAL SERIES :
TRUST, MFS SERIES TRUST I, MFS SERIES :
TRUST II, MFS SERIES TRUST III, MFS SERIES :
TRUST IV, MFS SERIES TRUST V, MFS SERIES :
TRUST VI, MFS SERIES TRUST VII, MFS SERIES :
TRUST VIII, MFS SERIES TRUST IX, MFS :
SERIES TRUST X, MFS SERIES TRUST XI, SUN :
LIFE FINANCIAL, INC., MASSACHUSETTS :
FINANCIAL SERVICES COMPANY DBA MFS :
INVESTMENT MANAGEMENT, and JOHN DOES :
1-100 :

Defendants. :

-----X

-----X

STEVEN GREENBERG, on Behalf of Himself and
All Others Similarly Situated,

Plaintiff,

vs.

MASSACHUSETTS FINANCIAL SERVICES
COMPANY, MFS SERIES TRUST I, MFS SERIES
TRUST II, MFS SERIES TRUST III, MFS SERIES
TRUST IV, MFS SERIES TRUST V, MFS SERIES
TRUST VI, MFS SERIES TRUST VII, MFS SERIES
TRUST VIII, MFS SERIES TRUST IX, MFS
SERIES TRUST X, and MFS SERIES TRUST XI,

Defendants.

-----X

Civ. No. 03 CV 12545 (WGY)

-----X
JACOB ELEPHANT, on Behalf of Himself and
All Others Similarly Situated,

Plaintiff,

Civ. No. 03 CV 12570 (WGY)

vs.

MASSACHUSETTS FINANCIAL SERVICES
COMPANY, MFS INVESTMENT
MANAGEMENT, SUN LIFE FINANCIAL, INC.,
MFS SERIES TRUST I, MFS SERIES TRUST II,
MFS SERIES TRUST III, MFS SERIES TRUST IV,
MFS SERIES TRUST V, MFS SERIES TRUST VI,
MFS SERIES TRUST VII, MFS SERIES TRUST
VIII, MFS SERIES TRUST IX, MFS SERIES
TRUST X, MFS SERIES TRUST XI, MFS
CAPITAL OPPORTUNITIES FUND, MFS CORE
GROWTH FUND, MFS LARGE CAP GROWTH
FUND, MFS MANAGED SECTORS FUND, MFS
MID CAP GROWTH FUND, MFS NEW
DISCOVERY FUND, MFS NEW ENDEAVOR
FUND, MFS RESEARCH FUND, MFS
STRATEGIC GROWTH FUND, MFS
TECHNOLOGY FUND, MASSACHUSETTS
INVESTORS GROWTH STOCK, MFS MID CAP
VALUE FUND, MFS RESEARCH GROWTH
AND INCOME FUND, MFS TOTAL RETURN
FUND, MFS UNION STANDARD EQUITY FUND,
MFS UTILITIES FUND, MFS VALUE FUND,
MASSACHUSETTS INVESTORS TRUST, MFS
AGGRESSIVE GROWTH ALLOCATION FUND,
MFS CONSERVATIVE ALLOCATION FUND,
MFS MODERATE ALLOCATION FUND, MFS
BOND FUND, MFS EMERGING MARKETS
DEBT FUND, MFS GOVERNMENTAL
LIMITED MATURITY FUND, MFS
GOVERNMENT MORTGAGE FUND, MFS
GOVERNMENT SECURITIES FUND, MFS
HIGH INCOME FUND, MFS HIGH YIELD
OPPORTUNITIES FUND, BOND FUND, MFS

LIMITED MATURITY FUND, MFS RESEARCH :
 BOND FUND, MFS STRATEGIC INCOME FUND, :
 MFS ALABAMA MUNICIPAL BOND FUND, :
 MFS ARKANSAS MUNICIPAL BOND FUND, :
 MFS CALIFORNIA MUNICIPAL BOND FUND, :
 MFS FLORIDA MUNICIPAL BOND FUND, MFS :
 GEORGIA MUNICIPAL BOND FUND, MFS :
 MARYLAND MUNICIPAL BOND FUND, MFS :
 MASSACHUSETTS MUNICIPAL BOND FUND, :
 MFS MISSISSIPPI MUNICIPAL BOND FUND, :
 MFS MUNICIPAL BOND FUND, MFS :
 MUNICIPAL LIMITED MATURITY FUND, :
 MFS NEW YORK MUNICIPAL BOND FUND, :
 MFS NORTH CAROLINA MUNICIPAL BOND :
 FUND, MFS PENNSYLVANIA MUNICIPAL :
 BOND FUND, MFS SOUTH CAROLINA :
 MUNICIPAL BOND FUND, MFS TENNESSEE :
 MUNICIPAL BOND FUND, MFS VIRGINIA :
 MUNICIPAL BOND FUND, MFS WEST :
 VIRGINIA MUNICIPAL BOND FUND, MFS :
 EMERGING MARKETS EQUITY FUND, MFS :
 GLOBAL EQUITY FUND, MFS GLOBAL :
 GROWTH FUND, MFS GLOBAL TOTAL :
 RETURN FUND, MFS INTERNATIONAL :
 GROWTH FUND, MFS INTERNATIONAL :
 NEW DISCOVERY FUND, MFS :
 INTERNATIONAL VALUE FUND, MFS :
 RESEARCH INTERNATIONAL FUND, JOHN :
 DOES 1-100, and MFS FUNDS :
 :
 :
 Defendants. :
 -----X

-----X
YAKOV BURSTEIN, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

Civ. No. 03 CV 12622 (WGY)

vs.

MFS GLOBAL TELECOMMUNICATIONS FUND,
CAPITAL OPPORTUNITIES FUND, MFS CORE
GROWTH FUND, MFS LARGE CAP GROWTH
FUND, MFS MANAGED SECTORS FUND, MFS
MID CAP GROWTH FUND, MFS NEW
DISCOVERY FUND, MFS NEW ENDEAVOR
FUND, MFS RESEARCH FUND, MFS
STRATEGIC GROWTH FUND, MFS
TECHNOLOGY FUND, MASSACHUSETTS
INVESTORS GROWTH STOCK, MFS MID CAP
VALUE FUND, MFS RESEARCH GROWTH
AND INCOME FUND, MFS TOTAL RETURN
FUND, MFS UNION STANDARD EQUITY FUND,
MFS UTILITIES FUND, MFS VALUE FUND,
MASSACHUSETTS INVESTORS TRUST, MFS
AGGRESSIVE GROWTH ALLOCATION FUND,
MFS CONSERVATIVE ALLOCATION FUND,
MFS MODERATE ALLOCATION FUND, MFS
BOND FUND, MFS EMERGING MARKETS
DEBT FUND, MFS GOVERNMENTAL
LIMITED MATURITY FUND, MFS
GOVERNMENT MORTGAGE FUND, MFS
GOVERNMENT SECURITIES FUND, MFS
HIGH INCOME FUND, MFS HIGH YIELD
OPPORTUNITIES FUND, BOND FUND, MFS
LIMITED MATURITY FUND, MFS RESEARCH
BOND FUND, MFS STRATEGIC INCOME FUND,
MFS ALABAMA MUNICIPAL BOND FUND,
MFS ARKANSAS MUNICIPAL BOND FUND,
MFS CALIFORNIA MUNICIPAL BOND FUND,
MFS FLORIDA MUNICIPAL BOND FUND, MFS
GEORGIA MUNICIPAL BOND FUND, MFS
MARYLAND MUNICIPAL BOND FUND, MFS

MASSACHUSETTS MUNICIPAL BOND FUND, :
 MFS MISSISSIPPI MUNICIPAL BOND FUND, :
 MFS MUNICIPAL BOND FUND, MFS :
 MUNICIPAL LIMITED MATURITY FUND, :
 MFS NEW YORK MUNICIPAL BOND FUND, :
 MFS NORTH CAROLINA MUNICIPAL BOND :
 FUND, MFS PENNSYLVANIA MUNICIPAL :
 BOND FUND, MFS SOUTH CAROLINA :
 MUNICIPAL BOND FUND, MFS TENNESSEE :
 MUNICIPAL BOND FUND, MFS VIRGINIA :
 MUNICIPAL BOND FUND, MFS WEST :
 VIRGINIA MUNICIPAL BOND FUND, MFS :
 EMERGING MARKETS EQUITY FUND, MFS :
 GLOBAL EQUITY FUND, MFS GLOBAL :
 GROWTH FUND, MFS GLOBAL TOTAL :
 RETURN FUND, MFS INTERNATIONAL :
 GROWTH FUND, MFS INTERNATIONAL :
 NEW DISCOVERY FUND, MFS :
 INTERNATIONAL VALUE FUND, MFS :
 RESEARCH INTERNATIONAL FUND, MFS :
 CASH RESERVE FUND, MFS GOVERNMENT :
 MONEY MARKET FUND, MFS :
 GOVERNMENT MONEY MARKET FUND, MFS :
 FUNDS, MFS MUNICIPAL SERIES TRUST, :
 MFS SERIES TRUST I, MFS SERIES TRUST II, :
 MFS SERIES TRUST III, MFS SERIES TRUST IV, :
 MFS SERIES TRUST V, MFS SERIES TRUST VII, :
 MFS SERIES TRUST VIII, MFS SERIES TRUST :
 IX, MFS SERIES TRUST X, MFS SERIES TRUST :
 XI, MFS FUND REGISTRANTS, SUN LIFE :
 FINANCIAL, INC., MASSACHUSETTS :
 FINANCIAL SERVICES COMPANY DBA MFS :
 INVESTMENT MANAGEMENT, JOHN DOES :
 1-100, MFS and SERIES TRUST VI, :
 :
 Defendants. :
 -----X

Movants (as defined in the accompanying Memorandum of Law), through their undersigned counsel, hereby move this Court for an order: (i) consolidating the related actions filed on behalf MFS Mutual Fund Purchasers, Redeemers or Holders, for violations of Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 (the "Exchange Act"), 15 U.S.C.

§§78j(b) and 78t(a), Rule 10b-5 promulgated thereunder, 17 C.F.R. §240.10b-5, Sections 11 and 15 of the Securities Act of 1933, and Sections 34 and 36 of the Investment Company Act., pursuant to Rule 42 of the Federal Rules of Civil Procedure; (ii) appointing Movants as Lead Plaintiffs on behalf of purchasers of MFS Mutual Funds, and (iii) approving Movants' selection of Stull, Stull & Brody and Weiss & Yourman as Lead Counsel and Gilman & Pastor, LLP as Liaison Counsel.

The Motion is brought on the grounds that the actions filed against MFS Company are substantially identical because each alleges claims for violations of Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 (the "Exchange Act"), 15 U.S.C. §§78j(b) and 78t(a), Rule 10b-5 promulgated thereunder, 17 C.F.R. §240.10b-5, Sections 11 and 15 of the Securities Act of 1933, and Sections 34 and 36 of the Investment Company Act, and is based upon the same factual allegations against substantially the same defendants. In addition, consolidation of these cases will promote efficiency.

The Motion is also made on the grounds that Movants meet the requirements of Rule 23 of the Federal Rules of Civil Procedure because their claims are typical of class members' claims and they each will fairly and adequately represent the Class.

The facts and law supporting the Motion are fully set forth in the accompanying Memorandum of Law in Support of the Burrell Proposed Lead Plaintiffs' Motion for Consolidation of Related Cases, Appointment as Lead Plaintiffs, and Approval of Lead Plaintiffs' Choice of Lead and Liaison Counsel.

Dated: February 9, 2004

Respectfully submitted,

GILMAN AND PASTOR, LLP

By: David Pastor

David Pastor (BBO #391000)
Stonehill Corporate Center
999 Broadway, Suite 500
Saugus, MA 01906
(781) 231-7850

**Proposed Liaison Counsel
For Plaintiffs and the Class**

STULL, STULL & BRODY

Jules Brody
Aaron L. Brody
Bradley P. Dyer
6 East 45th Street
New York, New York 10017
(212) 687-7230

WEISS & YOURMAN

Joseph Weiss
David C. Katz
Jack I. Zwick
551 Fifth Avenue, Suite 1600
New York, NY 10176
(212) 682-3025

**Proposed Lead Counsel For
Plaintiffs and The Class**

CERTIFICATE OF SERVICE

I Hereby Certify That A True Copy of
The Above Document Was Served Upon
The Attorney Of Record For Each Other

Party By Mail (By Hand) On 2/9/04

David Pastor